

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

IN THE MATTER OF THE SEARCH OF:

**INFORMATION AT SYNCHRONOSS
TECHNOLOGIES ASSOCIATED WITH
A VERIZON CLOUD ACCOUNT FOR
TELEPHONE NUMBER 513-939-8580
(1:22-MJ-570)**

**INFORMATION AT SYNCHRONOSS
TECHNOLOGIES ASSOCIATED WITH
A VERIZON CLOUD ACCOUNT FOR
TELEPHONE NUMBER 513-939-8580
(1:22-MJ-577)**

**CASE NOS. 1:22-MJ-570
1:22-MJ-577**

**MOTION AND ORDER REQUESTING THE
SEARCH WARRANT, APPLICATION AND
AFFIDAVIT FOR SEARCH WARRANT,
RETURN, AND THIS MOTION AND ORDER
REMAIN SEALED**

Now comes the United States Attorney and moves this Court, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, and the Court's inherent power to control papers filed with the Court, for an order requiring that the Search Warrants, the Applications and Affidavits for Search Warrants, the Returns, and any other filings associated with the above-referenced case numbers, including this Motion and Order remain sealed for until **January 31, 2023** or until such time as an Indictment or Information is filed or until directed by this Court.

In support of this Motion, the United States Attorney charges:

1. The case numbers referenced above relate to the same ongoing investigation.
2. There is no Indictment or Information pending before any United States District Court which necessitates the disclosure of any documents filed under these case numbers.
3. Pursuant to Rule 12 of the Federal Rules of Criminal Procedure the proper time for moving to suppress evidence obtained pursuant to the Court order is subsequent to the filing of an Indictment or Information and arraignment thereon. Therefore, no prejudice would be caused to any defendant or potential defendant by the

granting of this motion.

4. The disclosure of certain information and statements contained in said documents filed under these case numbers would alert the targets to the existence, nature and scope of an ongoing, covert criminal investigation, and could lead to the destruction of evidence or endanger confidential sources and/or undercover agents involved in the investigation.

WHEREFORE, the United States of America respectfully requests that any documents related to the above case numbers, including this Motion and Order remain sealed until **January 31, 2023** and kept from public inspection until further order of the Court.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

s/ Kyle J. Healey
KYLE J. HEALEY
Assistant United States Attorney
221 East Fourth Street, Suite 400
Cincinnati, Ohio 45202
Office: (513) 684-3711

Upon the Motion of the United States Attorney and for good cause shown, it is

ORDERED that all documents filed under the above-referenced case numbers, including this Motion and Order remain sealed until **January 31, 2023**, and the Clerk is instructed not to unseal said documents filed under the above-case numbers, including this motion and order, until further order of this Court, or the expiration **January 31, 2023**, whichever comes first.

10/21/2022
DATE

Karen L. Litkovitz
HONORABLE KAREN L. LITKOVITZ
UNITED STATES MAGISTRATE JUDGE